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*Additional parties and counsel listed on  
signature pages*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR

THIS FILING RELATES TO:

*Hicks v. Meta Platforms, Inc.*, 4:22-cv-06627

**STIPULATED PROTOCOL FOR  
PLAINTIFF MEDICAL EVALUATION**

The parties, by and through their undersigned counsel, hereby stipulate and agree to the following with regard to the mental examination (“ME”) of Plaintiff David Melton (“Melton”) pursuant to Federal Rule of Civil Procedure 35.

1. This Protocol governs the nature of the ME to be conducted for Plaintiff Melton.
2. The ME shall be conducted by Dr. James McGough, who is a “suitably licensed or certified examiner” under Rule 35(a).
3. The ME shall take place remotely via Zoom on June 28, 2025 beginning at 11 AM CST.
4. The ME shall not last longer than three hours, not inclusive of any breaks.

1           5.       The ME will be limited in scope to assessing the extent, nature, and possible cause(s) of  
2 any mental or psychiatric disorders or illnesses. Dr. McGough will only conduct psychiatric and  
3 psychological evaluations of each Plaintiff and will not conduct any testing.

4           6.       Neither party is entitled to videotape any portion of the ME. However, either party may  
5 elect to record the examination by audio technology.

6           7.       One counsel for Plaintiff may be present, or appear virtually via Zoom (with camera on),  
7 during the ME as an observer. An observer may monitor the examination, but shall not participate in or  
8 disrupt it. Plaintiff's counsel will not discuss the substance of the ME with Plaintiff during breaks. No  
9 family member or friend shall attend or be in the room while the ME is in progress.

10          8.       The ME will be transmitted via Zoom with an audio and visual telecast, allowing additional  
11 defense experts and plaintiffs' experts and counsel to observe virtually (with cameras off). The Zoom  
12 screen and the number of people in attendance will not be visible to the Plaintiff during the ME. Plaintiff's  
13 face shall be visible on camera in a wide view, but the camera shall not be directly in front of him.. Dr.  
14 McGough and the Defendants' representative handling logistics will not speak with or attempt to engage  
15 any family member or friend who may accompany Plaintiff to the examination.

16          9.       No family member or friend shall attend or observe the ME either in person or remotely  
17 while the ME is in progress; nor shall any such individual speak with or interact with Plaintiff Melton  
18 during the entirety of the ME, inclusive of any breaks.

19          10.      No person other than those specifically mentioned in this stipulation shall be present in  
20 person or remotely during the ME.

21          11.      Defendants will provide Plaintiff's counsel with "a copy of the examiner's report, together  
22 with like reports of all earlier examinations of the same condition" in accordance with the deadline for  
23 Defendants' case-specific expert reports in Case Management Order No. 18. Defendants are entitled to  
24 request and receive "like reports of all earlier or later examinations of the same condition" as provided by  
25 the Rule. All drafts of such reports are considered privileged and need not be disclosed.

26               By stipulating to this agreement, the parties agree to abide by these protocols unless and  
27 until the Court denies this stipulation.

28               **IT IS SO STIPULATED AND AGREED.**

DATED: June 27, 2025

Respectfully submitted,

/s/ Joseph G. VanZandt

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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: June 27, 2025

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen